

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
JACQUELYN N. WITT  
3 Assistant Federal Public Defender  
Nevada State Bar No. 13877  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577  
Jackie\_Witt@fd.org

6 Attorney for Seagram Joshua Miller

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 v.  
12 SEAGRAM JOSHUA MILLER,  
13 Defendant.

Case No. 2:21-cr-00038-JCM-VCF

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
16 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for  
17 the United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn  
18 N. Witt, Assistant Federal Public Defender, counsel for Seagram Joshua Miller, that the  
19 Revocation Hearing currently scheduled on April 12, 2024, be vacated and continued to a date  
20 and time convenient to the Court, but no sooner than thirty (30) days.

21 This Stipulation is entered into for the following reasons:

22 This is the first request for a continuance of the preliminary hearing.

23 1. Defense counsel needs additional time to advise Mr. Miller on this matter, and  
24 additional time is required to conduct necessary investigation as to the allegations in the  
25 Petition.  
26

1           2.       Defense counsel requests additional time to attain mitigating information and  
2 prepare for the revocation hearing, if necessary.

3           3.       Defense counsel received discovery on April 4, 2024, and additional time is  
4 needed to review the discovery with Mr. Miller and advise him on the same.

5           3.       Mr. Miller is in custody and agrees with the need to continue the hearing.

6           4.       The parties agree to the continuance.

7           This is the first request for a continuance of the revocation hearing.

8           DATED this 3rd day of April, 2024.

9           RENE L. VALLADARES  
10          Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

11          By /s/ Jacquelyn N. Witt  
12          JACQUELYN N. WITT  
            Assistant Federal Public Defender

            By /s/ Kimberly M Frayn  
            KIMBERLY M. FRAYN  
            Assistant United States Attorney

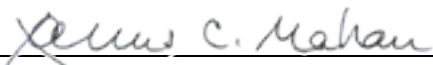
1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,  
6 v.  
7 SEAGRAM JOSHUA MILLER,  
8 Defendant.

Case No. 2:21-cr-00038-JCM-VCF  
**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled  
11 for April 12, 2024, at 10:00 a.m., be vacated and continued to **May 13, 2024, at 10:30 a.m.**  
12

13 DATED April 8, 2024.

14  
15   
16 UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26